

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

CHRISTOPHER JOHNSON and TARA  
FOLLARI-JOHNSON, individually and on  
behalf of other members of the general  
public similarly situated,

Plaintiffs,

v.

GENERAL MOTORS LLC, a Delaware Limited  
Liability Company; GENERAL MOTORS  
COMPANY, a Delaware Corporation,

Defendants.

Civil Action No. 2:14-CV-07924-KM-MAH

**STIPULATION AND [PROPOSED]  
ORDER OF DISMISSAL WITH  
PREJUDICE**

The parties, through their undersigned counsel, Scarinci & Hollenbeck, LLC and Capstone Law APC, attorneys of record for plaintiffs Christopher Johnson and Tara Follari-Johnson (collectively, “Plaintiffs”), and Seyfarth Shaw LLP, attorneys of record for defendants General Motors LLC and General Motors Company (collectively, “Defendants”), hereby state as follows:

WHEREAS, Plaintiffs filed the Class Action Complaint on December 19, 2014;

WHEREAS, Defendants filed their Motion to Dismiss on March 16, 2015;

WHEREAS, in lieu of further briefing on Defendants’ Motion to Dismiss, the parties have reached a good faith resolution, pursuant to which Plaintiffs have agreed to voluntarily dismiss this action and their claims against Defendants with prejudice in exchange for adequate consideration;

WHEREAS, in reaching this good faith resolution, Defendants expressly deny any liability for the claims alleged against them in this action;

WHEREAS, a class has not been certified in this action as of the date of this Stipulation, and therefore court approval under Fed. R. Civ. P. 23(e) is not required;

NOW, THEREFORE, pursuant to Fed. R. Civ. P. 41(a)(1), IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, and therefore IT IS on this 4th day of May, 2015, ORDERED that this action and the claims of plaintiffs be, and the same hereby are, dismissed with prejudice, and without costs to any party, all rights of appeal withdrawn and waived.

**STIPULATED AND AGREED:**

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By: /s/ Ardrelle M. Bahar  
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*Attorneys for Defendants, General Motors  
Company and General Motors LLC*

**SO ORDERED:**

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Hon. Kevin McNulty  
United States District Judge